

February 27, 2015

Federal Communications Commission
Attn: Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

Re: Cloud Call - CPNI Certification (FCC) (Due: March 1, 2015) REVISED

Attention -

On behalf of our client, Cloud Call Center PBX Solutions, LLC, The Compliance Group submits the enclosed updated regulatory report: CPNI Certification (FCC) (Due: March 1, 2015). This report covers the following reporting period: January 1, 2014 - December 31, 2014.

This CPNI Certification supplants the CPNI Certification previously filed on February 24, 2015.

Please do not hesitate to contact the undersigned directly with any questions about this report at cac@compliancegroup.com.

Respectfully Submitted,



Chris Canter

On behalf of Cloud Call Center PBX Solutions, LLC

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

In accordance with Section 222 of the Communications Act and the Federal Communications Commission's ("FCC") CPNI Rules (47 C.F.R. Section 64.2001, et seq.), Cloud Call Center PBX Solutions, LLC ("Cloud Call") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

Cloud Call provides telecommunications services to retail, enterprise customers; service offerings are not marketed to residential users.

Cloud Call's official policy as it relates to CPNI is that it does not disclose, use or sell CPNI. Even so, the Company undertakes the steps outlined in this Statement of Policy to protect CPNI from unauthorized access or misuse and to comply with FCC CPNI Rules.

Definition of CPNI

Under federal law, CPNI is certain customer information obtained by a telecommunications provider during the course of providing telecommunications services (including interconnected VoIP) to a customer. This includes information relating to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier. Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

Use of CPNI

It is the policy of Cloud Call not to disclose, use or sell CPNI for any activity other than as permitted by applicable law. Any disclosure of CPNI to other parties [outside of the authorized customer contact(s)] such as affiliates, vendors and agents occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by Cloud Call to the customer. Except in instances where Cloud Call is required by law to disclose CPNI, such as through subpoenas or other requests by law enforcement officials, or if the intended use is permitted by FCC Rules, Cloud Call will first obtain the customer's consent prior to using or sharing CPNI.

Disclosure of CPNI

CPNI is only disclosed to "valid customer contact(s)". Usually, valid contact(s) is/are the person(s) who signed the company's Customer Service Agreement ("CSA") or others named on the CSA. Copies of all CSA's are associated with each account in the Customer Relations Management ("CRM") system. The valid contact(s) may designate or approve others to receive CPNI through an email request sent from the email address that we have on file as associated with the valid contact for that account from the CSA.

Telephone requests are not honored without an email from the associated address of a valid contact. When a request for CPNI is received by telephone, the calling party must verify the request with an email from an/the associated valid customer email address.

Requests for CPNI are authenticated and released when:

- They are verified with a request from an existing valid contact who may approve or deny the request through an email from the associated address, or



- The results of the request (for example, a Call Detail Record) may only be sent via email to the valid contact versus the non-valid requestor

Online Access to CPNI & Password Procedures

Customers do have access to their own CPNI through three online portals:

Billing System Portal (Billing System #1)

- The login and password for this portal are sent directly to the valid contact's email address of record and cannot be changed remotely by the customer but only by support personnel with access to the billing system.
- Once again, these changes can only be made by the valid contact with an email request from the associated valid address.

Billing System Portal (Billing System #2)

- A temporary password is given directly to the valid contact upon account creation via email. Customers must change their password upon their first attempt to login to the system. This new password cannot be seen from within the billing system.
- Customers can change their password in two ways:
 - By using a link on the login page, but the new temporary password is only sent to the valid contact's email address.
 - Through the web portal itself, but the login and old password must be supplied.

Customer Relations Management Portal

- Upon account inception, a company support team member generates a new Password and Login from the CRM that is directly sent from the CRM to the valid contact, which is based off of the contact information in the CRM system
- If manually requested, the Login and Password are released by support personnel only to the valid contact based on an email request from the associated address or the customer can change the Password automatically directly via the CRM system.
- Once received, customers can change their own Password. However, when they submit a request to change the password via the portal, they can only access the password change interface through an email sent from the email address associated with the login name.

Password Use:

Telephone requests are not honored without an email from the associated address of a valid contact. When a request for CPNI is received by telephone, the calling party is asked to verify the request with an email from the associated email address.



Account Change Notification

Cloud Call notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

Disclosure to Business Customers

Cloud Call may negotiate alternative authentication procedures for services that the Company provides to business customers that have a dedicated account representative and a contract that specifically addresses the protection of CPNI.

Employee Training Policies and Disciplinary Procedures

All employees of Cloud Call are trained as to when they are, and are not, authorized to use CPNI. Through this training, Cloud Call has informed its employees and vendors that it considers compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important. Violation by company employees or vendors of such CPNI requirements will lead to disciplinary action (including remedial training, reprimands, unfavorable performance reviews, probation, and/or termination), depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from a supervisor, and the extent to which the violation was or was not deliberate or malicious).

Use of CPNI in Sales and Marketing Campaigns

Cloud Call prohibits the use, legal or otherwise, of CPNI for sales and marketing campaigns. Were this policy to change, it would follow established guidelines that must be followed. If Cloud Call uses CPNI in marketing campaigns, the company will maintain a record of all sales and marketing campaigns that use the CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

Cloud Call will also implement a system to obtain prior approval and informed consent from its customers in accordance with the CPNI Rules. This system will allow for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.

Prior to commencement of a sales or marketing campaign that utilizes CPNI, Cloud Call will establish the status of a customer's CPNI approval. The following sets forth the procedure that will be followed by the Company:

- Prior to any solicitation for customer approval, Cloud Call will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
- Cloud Call will use opt-in approval for any instance in which Company must obtain customer approval prior to using, disclosing or permitting access to CPNI.
- A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.
- Records of approvals are maintained for at least one year.
- Cloud Call provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI.
- The CPNI notices sent by Cloud Call comply with FCC Rule 64.2008(c).

Cloud Call will also establish a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one (1) year.



FCC Notification

The Company is prepared to provide written notice within five (5) business days to the FCC of any instance where the opt-in mechanisms do not work properly or to such a degree that consumers' inability to opt-in is more than an anomaly.

Third Party Use of CPNI

To safeguard CPNI, prior to allowing joint ventures or independent contractors access to customers' individually identifiable CPNI, Cloud Call will require all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy. Cloud Call shall also obtain opt-in consent from a customer prior to disclosing the information to such third parties for marketing purposes. In addition, Cloud Call requires all outside agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.

Cloud Call requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.

Cloud Call does not market or sell CPNI information to any third party.

Law Enforcement Notification of Unauthorized Disclosure

If an unauthorized disclosure of CPNI occurs, Cloud Call shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI"). Cloud Call shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.

Notwithstanding the above, Cloud Call shall not wait the additional seven (7) days to notify its customers if the Company determines there is an immediate risk of irreparable harm to the customers.

Cloud Call shall maintain records of discovered breaches for a period of at least two (2) years.

Customer Complaints

Cloud Call has not received any customer complaints in the past year concerning the unauthorized release of or access to CPNI.

Contact Information

Individuals or entities that have questions about this CPNI Certification or the use of CPNI by Cloud Call may contact the company's legal counsel, The *CommLaw* Group at (703) 714-1300.

Actions taken against Pretexters

Cloud Call has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC in the past year. Cloud Call has no information, other than information that has been publicly reported, regarding the processes that pretexters are using to attempt to access CPNI.



Annual CPNI Certification

Pursuant to FCC regulations, 47 C.F.R. § 64.20089(e), Cloud Call will annually submit to the FCC, prior to March 1st, a CPNI Certification of Compliance and accompanying Statement regarding the company's CPNI policies and operating procedures. These documents certify that Cloud Call complied with federal laws and FCC regulations regarding the protection of CPNI throughout the prior calendar year.

A handwritten signature, possibly "T. L.", is enclosed within a hand-drawn oval in the bottom right corner of the page.

Cloud Call Center PBX Solutions, LLC

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36**

Reporting Period: January 1, 2014 - December 31, 2014

Date Filed: February 27, 2015

Filer ID: 829977

Name of Signatory: Tim Wise

Title of Signatory: Managing Member

I, Tim Wise, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: 

On behalf of Cloud Call Center PBX Solutions, LLC